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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**CR No. 3:16-CR-00051-BR-3**

**PLAINTIFF,**

**v.** **UNOPPOSED MOTION FOR  
MODIFICATION OF ORDER SETTING  
CONDITIONS OF RELEASE**

**JOSEPH O'SHAUGHNESSY,**

**DEFENDANT.**

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Mr. O'Shaughnessy, through counsel, moves this Court for an Order deleting Additional Condition of Release #4 (employment) listed in the Order Setting Conditions of Release dated December 4, 2017. The reasons for this request are outlined in the attached Declaration. This Motion is unopposed by the government and pretrial services.

DATED this January 19, 2018

s/ Anthony C. Schwartz  
Anthony C. Schwartz